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March 16, 2015

VIA E-FILING

Jocelyn Boyd, Esquire
Chief Clerk and Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, SC 29210

RE: B2 Holdings, LLC, Complainant/Petitioner v. Carolina Water Service, Inc.
Defendant/Respondent
Docket No. 2014-481-WS

Dear Ms. Boyd:

Enclosed for filing please find the Return to Complainant/Petitioner's Request for Reconsideration filed on behalf of Carolina Water Service, Inc. and Certificate of Service in connection with the above-referenced matter. By copy of this letter I am serving all parties of record.

If you or counsel has questions, please feel free to contact me.

Sincerely,

Elliott & Elliott, P.A.

Scott Elliott

SE/lbk

Enclosures

cc: All Parties of Record w/enc.

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:


RE: B2 Holdings, LLC, Complainant/Petitioner v. Carolina
Water Service, Inc., Defendant/Respondent
Docket No. 2014-481-WS

PARTIES SERVED: Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Laura P. Valtorta, Esquire
903 Calhoun Street
Columbia, SC 29201

PLEADINGS: Return to Complainant/Petitioner's Request for
Reconsideration

March 16, 2015


Linda B. Kitchens
Legal Assistant

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2014-481-WS

IN RE: B2 Holdings, LLC)	
Complainant/Petitioner v. Carolina)	RETURN TO
Water Service, Inc.,)	COMPLAINANT/PETITIONER'S
Defendant/Respondent)	REQUEST FOR
)	RECONSIDERATION
)	

Carolina Water Service, Inc. ("Carolina Water"), the Defendant/Respondent in the above-captioned docket, herewith makes Return to the Complainant/Petitioner's Request for Reconsideration. The Complainant/Petitioner raises no issue which would entitle it to the relief requested.

1. The Complainant/Petitioner argues that in dismissing its complaint, the South Carolina Public Service Commission ("Commission") failed to consider the impact of proposed amendment to the South Carolina Department of Health and Environmental Control ("DHEC") loading guidelines on Carolina Water's existing rates. Carolina Water's rate design was approved by Order No. 2014-207 after a rate case fully investigated by the Office of Regulatory Staff. The Commission acted within its discretion to approve Carolina Water's rate design based on the DHEC Contributory Unit Wastewater Loading guidelines set out in Appendix A to 25 S.C. Code Regs. 61-67. Consequently, Carolina Water's rates are in all respects just and reasonable and enforceable. The Complainant/Petitioner seeks to

collaterally attack the rate design approved in Order No. 2014-207. The proposed amendments to the DHEC loading guidelines are not effective. Contrary to the Complainant/Petitioner's assumption, any change in the loading guidelines will not by operation of law act to modify Carolina Water's rates. Moreover, the Complainant/Petitioner fails to explain the impact of reduction of its rates on Carolina Water's rate design. The Complainant/Petitioner fails to proffer any evidence of Defendant/Respondent's cost of service, the revenue required to meet its cost of service or the allocation of expense and revenue to the appropriate class of customers. Any reduction or modification of Carolina Water's rates, whether to a volumetric rate or to a rate based on the proposed modifications to the loading guidelines, is better addressed in a full rate case proceeding and the Commission correctly so held in Order No. 2015-143. The Commission's holding in Order No. 2015-143 applies with equal force to the complaint filed herein or to an amended complaint based on a proposed DHEC regulation. The Complainant/Petitioner has failed to meet its burden required to justify a reversal of the Commission Order No. 2015-143, and its Request for Reconsideration should be denied.

2. The Request for Reconsideration petitions the Commission to make an exception of the Complainant/Petitioner and reduce its rates by one thousand one hundred forty and no/100 (\$1,140.00) representing six (6) months of undercharged sewer service. The Complainant/Petitioner cites no authority to justify its entitlement to exceptional treatment. Indeed, the Commission has no such authority. The Complainant/Petitioner does not allege that Carolina Water miscalculated B2 Holdings sewer service bills. Carolina Water, as recognized by Commission Order No. 2015-143, has agreed to accept payment of

the undercharged amount over a six (6) month period. The Complainant/Petitioner has raised no issue nor made any argument which would entitle it to the relief requested.

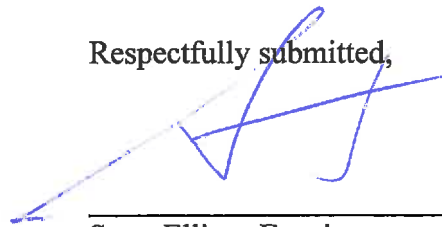
3. The Complainant/Petitioner “notes” that not all Carolina Water customers are charged consistently. However, the Complainant/Respondent offers no proof to this effect. More important, the Complainant/Petitioner concedes that it is being charged the rates authorized by tariff.

4. The Complainant/Petitioner argues that its counsel did not receive an electronic copy of Carolina Water’s Return to the Complainant/Petitioner’s Motion to Amend and that the Complainant/Petitioner’s counsel was constrained from making a reply to the arguments raised in the return. The Complainant/Petitioner was served by mail with the return. As a courtesy, counsel for Carolina Water attempted to provide the Complainant/Petitioner’s counsel with a courtesy copy of the return via electronic mail without success. Nevertheless, as argued above, the Commission’s Order No. 2015-143 applies with equal force to both the complaint as filed and to any proposed amendment to the complaint. Any modifications to Carolina Water’s rates are best litigated in a full rate proceeding.

For the reasons set out herein, as well as those set out in the Defendant/Respondent’s Motion to Dismiss and in the Defendant/Respondent’s Return to the Motion to Amend the

Compliant, Carolina Water submits that the Complainant/Petitioner's Request for Reconsideration be denied.

Respectfully submitted,



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Attorney for Defendant/Respondent Carolina
Water Service, Inc.

Columbia, South Carolina
March 16, 2015